

**EXHIBIT A**

**PROPOSED ORDER**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES  
LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard  
L. Madoff Investment Securities LLC,

Plaintiff,

v.

Edward A. Zraick, Jr., individually and as joint tenant;  
Nancy Zraick, individually and as joint tenant; Patricia  
Zraick DeLuca, individually and as joint tenant; Karen M.  
Rich, individually and as joint tenant; Estate of Lorraine  
Zraick; Edward A. Zraick, Jr., as personal representative of  
the Estate of Lorraine Zraick; and Patricia Zraick DeLuca, as  
personal representative of the Estate of Lorraine Zraick,

Defendants.

Adv. Pro. No. 10-05257 (SMB)

**ORDER SHORTENING NOTICE PERIOD  
AND FIXING THE HEARING AND OBJECTION DEADLINE  
TO CONSIDER APPROVAL OF ZRAICK DEFENDANTS' MOTION  
FOR ENTRY OF AN ORDER (A) CLARIFYING THAT DEFENDANTS  
MAY COMMUNICATE WITH THEIR FINANCIAL INSTITUTIONS; AND  
(B) DESIGNATING ANY BANK RECORDS PRODUCED IN  
RESPONSE TO THE TRUSTEE'S SUBPOENAS AS CONFIDENTIAL**

Upon consideration of the *ex parte* motion (the “Motion”)<sup>1</sup> of Defendants Edward A. Zraick, Jr., Nancy Zraick, Patricia DeLuca, and Karen Rich (collectively, the “Defendants”) for the entry of an order, pursuant to Rule 9006(c)(1) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 9077-1(b) of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”), shortening the notice period with respect to the hearing on the *Zraick Defendants’ Motion for Entry of an Order (A) Clarifying that Defendants may Communicate with their Financial Institutions, and (B) Designating any Bank Records Produced in Response to the Trustee’s Subpoenas as Confidential* (the “Motion for Protective Order”); and upon consideration of the Rich Declaration; and the Court finding that (a) it has jurisdiction to consider the Motion pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.)*; (b) venue in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and (c) good and sufficient cause exists for the granting of the relief requested in the Motion after having given due deliberation upon the Motion and the Rich Declaration,

**IT IS HEREBY ORDERED, ADJUDGED, and DECREED THAT:**

1. The Motion is **GRANTED**.
2. The hearing (the “Hearing”) on the Motion for Protective Order shall take place before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, in Room 723 of the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”) on April \_\_, 2016, at \_\_: \_\_.m. (Eastern Standard Time).

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<sup>1</sup> Capitalized terms not defined herein shall have the meanings ascribed to such terms in the Motion.

3. Any deadlines and/or notice periods established by the Bankruptcy Rules and/or Local Rules, to the extent applicable, shall be modified and suspended to the extent necessary to hear and determine approval of the Motion for Protective Order at the Hearing.

4. Responses or objections, if any, to approval of the Motion for Protective Order must (a) be in writing; (b) set forth with particularity the basis for the response or objection; (c) be filed with the Clerk of the Bankruptcy Court (with a courtesy copy delivered directly to Chambers of the Honorable Stuart M. Bernstein, United States Bankruptcy Court for the Southern District of New York, Alexander Custom House, New York, New York 10004); and (d) be served on counsel for the Defendants, Hunton & Williams LLP, Attn: Robert A. Rich, 200 Park Avenue, 52<sup>nd</sup> Floor, New York, New York 10166 so as to actually be received by April \_\_, 2016, at \_\_: \_\_.m. (the "Objection Deadline").

5. Defendants shall serve a copy of this Order by email on Trustee's counsel upon its entry.

Dated: New York, New York  
April \_\_, 2016

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THE HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE